

45D10-2202-CT-000196

Lake Superior Court, Civil Division 6

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Clerk

Lake County, Indiana

STATE OF INDIANA)	IN THE LAKE SUPERIOR COURT NO. 5
) SS:	
LAKE COUNTY)	CAUSE NO. _____
INDRA JAIN and)	
SUSHIL JAIN)	
c/o SWEENEY JULIAN P.C.)	
1620 South Bend Avenue)	
South Bend, IN 46617,)	
)	
Plaintiffs,)	
v.)	
)	
KENNETH KNIGHT)	
W7936 Cloverleaf Lake Road)	
Clintonville, WI 54929, and)	
)	
LCK TRANSPORT, LLC)	
c/o Lisa Kielblock)	
Registered Agent)	
10368 State Highway 49)	
Rosholt, WI 54473,)	
)	
Defendants.)	

PLAINTIFFS' COMPLAINT FOR DAMAGES AND JURY DEMAND

Plaintiffs Indra Jain and Sushil Jain, by counsel, for their Complaint against the Defendants Kenneth Knight and LCK Transport, LLC states as follows:

1. On October 25, 2020, at approximately 4:50 p.m., Plaintiff Indra Jain was driving a 2010 Toyota Corolla eastbound on I-80 East near mile marker 15.3 in Lake Station, Lake County, Indiana. Sushil Jain was a restrained front passenger in this vehicle at that time and place.

2. At that time, Defendant Kenneth Knight was driving a 2007 Kenworth semi-truck also eastbound on I-80 East near mile marker 15.3 in Lake Station, Lake County, Indiana.

3. As Plaintiffs' vehicle slowed with traffic, Defendant Knight failed to control his vehicle and drove directly into the rear of Plaintiffs' vehicle causing a violent collision.

4. Defendant Kenneth Knight was negligent when he followed too closely, failed to maintain a proper lookout, drove too fast for the conditions, became distracted while driving, failed to maintain his vehicle, and/or failed to operate his vehicle in a safe and reasonable manner.

5. At all relevant times, Defendant Knight was operating his vehicle within the course and scope of his employment with Defendant LCK Transport, LLC.

6. Defendant LCK Transport, LLC is vicariously liable for actions and omissions of its employee, Kenneth Knight, through the doctrine of Respondeat Superior.

7. The collision described in paragraph 3 above was caused by the negligence of Defendants Kenneth Knight and LCK Transport, LLC.

8. As a direct and proximate result of the negligence of the Defendants, the Plaintiffs have sustained and will continue to sustain damages which include, but are not limited to:

A. Past and future pain and suffering;

- B. Past and future medical bills;
- C. Past and future economic loss;
- D. Lost Wages;
- E. Loss of the ability to function as a whole people; and

WHEREFORE, the Plaintiffs, Indra Jain and Sushil Jain, pray for:

- 1. Trial by Jury;
- 2. The costs of this action;
- 3. Full compensation for the injuries sustained; and
- 4. Any and all just relief in the premises.

Respectfully submitted:

SWEENEY • JULIAN

/s/ Anthony R. Stevens

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